

3612

**TRANSMITTAL OF UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY (U.S.
EPA) AND OHIO ENVIRONMENTAL
PROTECTION AGENCY (OEPA) COMMENT
RESPONSES FOR ADDITIONAL**

08/18/92

**DOE-2417-92
DOE-FN/EPA
4
LETTER
OU5**



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

3612

AUG 18 1992

DOE-2417-92

Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V -- 5HRE-8J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

Mr. Graham E. Mitchell, Project Manager
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Mitchell:

**TRANSMITTAL OF UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (U.S. EPA) AND
OHIO ENVIRONMENTAL PROTECTION AGENCY (OEPA) COMMENT RESPONSES FOR ADDITIONAL
MONITORING WELLS**

- References: 1) Letter, J.R. Craig to J.A. Saric and G.E. Mitchell, "Response to Comments on the OU5 Work Plan Addendum for Additional Monitoring Wells," dated January 22, 1992
- 2) Letter, J.A. Saric to J.R. Craig, "Response to Comments on the OU5 Work Plan Addendum for Additional Monitoring Wells," dated March 20, 1992
- 3) Letter, G.E. Mitchell to J.R. Craig, "OU5 Work Plan Addendum Response to Conditional Approval," dated February 11, 1992

In Reference 1, the Department of Energy (DOE) provided responses to the U.S. EPA and OEPA on the Additional Monitoring Wells Work Plan. In Reference 2, the U.S. EPA gave conditional approval for the work, but requested that additional information be provided on the response to original comment number 4. In Reference 3, the OEPA gave conditional approval for the work, but requested that additional information be provided on the response to original comments 6, 10, and 15. The enclosed information is provided to address the responses to the U.S. EPA and OEPA for this additional information.


AUG 19 1992

Recycled and Recyclable

3612

If you or your staff have any questions, please contact Pete Yerace at FTS/Commercial (513) 738-6178.

Sincerely,


Jack R. Craig
Fernald Remedial Action
Project Manager

FN:Yerace

Enclosure: As Stated

cc w/enc.:

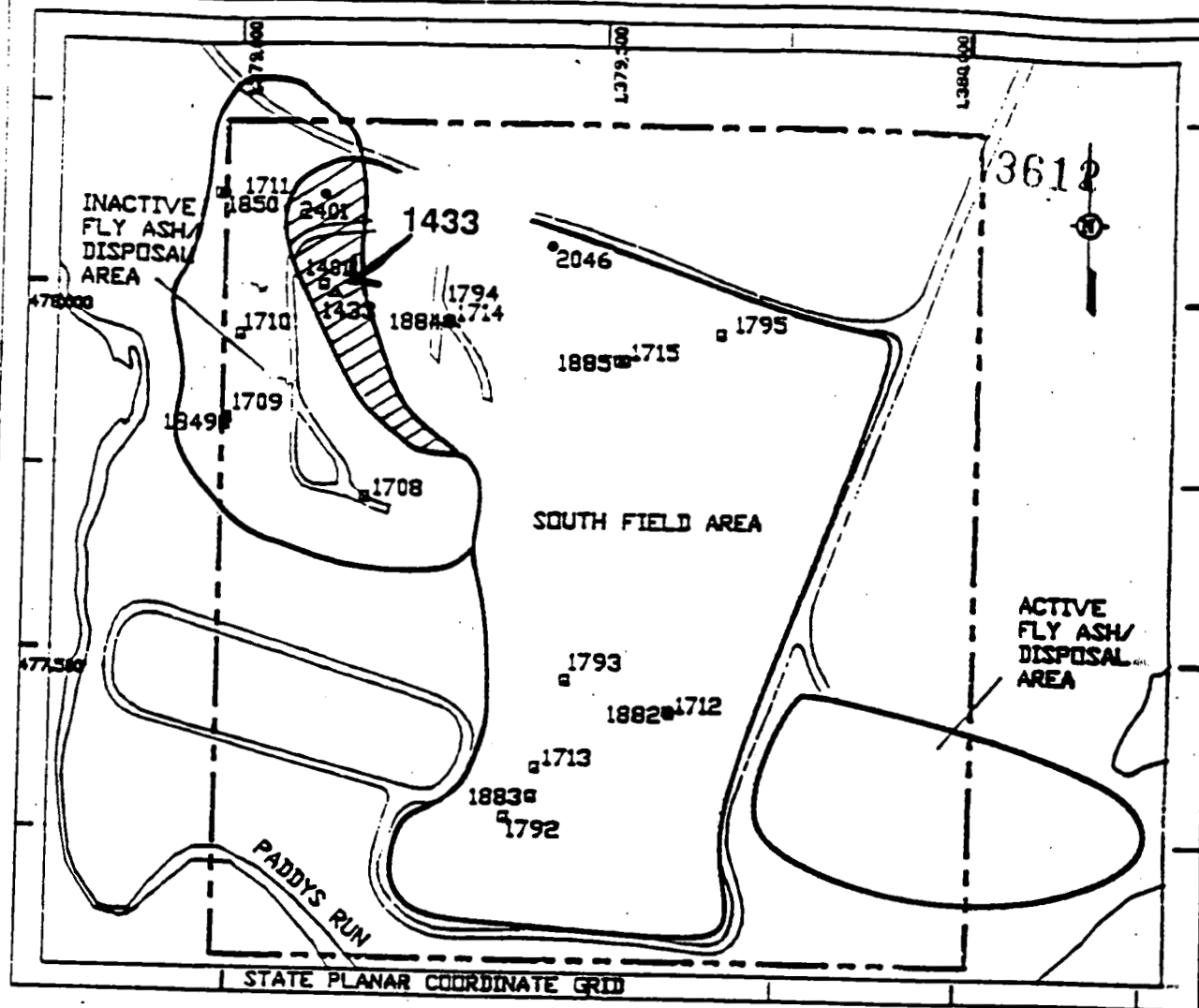
J. J. Fiore, EM-42, TREV
K. A. Hayes, EM-424, TREV
J. Benetti, USEPA-V, AT-18J
B. Barwick, USEPA-V, 5CS-TUB-3
J. Kwasniewski, OEPA-Columbus
P. Harris, OEPA-Dayton
M. Proffitt, OEPA-Dayton
T. Schneider, OEPA-Dayton
T. W. Hahne, PRC
L. August, GeoTrans
R. L. Glenn, Parsons
D. J. Carr, WEMCO
L. S. Farmer, WEMCO
J. P. Hopper, WEMCO
J. D. Wood, ASI/IT
J. E. Razor, ASI/IT
AR Coordinator, WEMCO

ADDITIONAL INFORMATION REQUESTED BY U.S. EPA 3612
ON THE U.S. DEPARTMENT OF ENERGY'S
OU5 CONDITIONALLY APPROVED WORK PLAN ADDENDUM
FOR ADDITIONAL MONITORING WELLS

Comment: The U.S. DOE must provide further information regarding the location and depth of the monitoring well located within the inactive fly ash pile.











Response: The well coordinates of monitoring well 1711, referenced in the original response, are 4781216.51N, 1378968.82E (state planar coordinate system). The location of this well is shown in Figure 1. This well was completed at a depth of 15.5 feet and screened at an interval of 13 to 15 feet in the perched water-bearing zone. Since installation, the water yields in the well have been insufficient to permit development and sampling. Due to the conditions present at Well 1711, no samples or perched water/leachate from within or below the contaminated fill in the inactive fly ash area have been collected and analyzed.

This information is still considered necessary and a new location is being proposed for the installation of a 1000-series well (well 1433) in the inactive fly ash area. The proposed location of well 1433 is also shown in Figure 1. A work plan addendum for Operable Unit 2 is currently being prepared for this scope of work. This information will be used to support both the OU2 and OU5 Remedial Investigation/Feasibility Study.



DIR_FAS.DVG DIR_FAS.PLT 4-20-92

LEGEND

-  OPERABLE UNIT 2
 BOUNDARY
 OPERABLE UNIT 2
 STUDY AREA
 ROADWAY
 WATERWAY
 OU2 RI/FS BORING LOCATIONS
 PROPOSED WELL 1433
 MONITORING WELLS
 OVER LAP AREA FOR
 INACTIVE FLY ASH PILE/
 SOUTHFIELD

SCALE (feet)



RESPONSES TO OHIO EPA COMMENTS ON THE U.S. DEPARTMENT OF
ENERGY'S OUS CONDITIONALLY APPROVED WORK PLAN ADDENDUM
FOR ADDITIONAL MONITORING WELLS

Comment 1: Original Comment #6. Ohio EPA has concerns regarding the use of regional aquifer parameters for a site-specific modeling requirement and thus disagree with DOE's response to Comment #6.

Response: DOE has acknowledged OEPA's concern on this issue. Accordingly, as the South Groundwater Contamination Plume Removal Action is the most time-critical action where this information is needed, the FEMP has submitted plans to the Ohio EPA for the development of additional site-specific hydrogeologic data for the FEMP site as part of the South Plume Removal Action-Part 2. The Ohio EPA has conditionally approved the plans for conducting the pump test. Specifications for the pump test have been completed and submitted to the U.S. EPA and Ohio EPA for review and comment. Results of the South Plume pump test will be compared against the model to determine how well the model is predicting flow behavior in the South Plume area. All information developed will be submitted to Ohio EPA.

The effort resulting from the South Plume area evaluation and possible future work will aid in determining if the model is properly simulating the hydrogeologic environment beneath the FEMP.

Action: As stated in response.

Comment 2: Original Comment #10. As stated above, the Ohio EPA has reviewed the appropriate sections of the groundwater report (i.e., Sections 13 and 18 through 22) and continue to have concerns regarding the use of regional aquifer parameters in the site specific model.

Response: Refer to Comment Response 1.

Action: As stated in response.

Comment 3: Original Comment #15. Ohio EPA is concerned with the use of a single retardation factor of 12 for the complex hydrogeology at the FEMP site.

Response: The selection of a single retardation factor of 12 for use in the SWIFT III Solute Transport Model is based on site-specific geochemical work, modeling work, and best professional judgement. An in-depth discussion of why 12 was selected is presented in the DOE response to Ohio EPA comment #13 on the U.S. DOE's *South Plume Removal Action Groundwater Modeling Report*, which is being sent under a separate transmittal letter.

Action: None required.